

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

v.

TIBIUS EDWARDS

) INDICTMENT NO.

)

) 18 U.S.C. § 2422(b)

) Coercion and Enticement of a

) Minor to Engage in Sexual Activity

)

) 18 U.S.C. § 2251(a)

) Production of Child Pornography

)

) 18 U.S.C. § 1470

) Transfer of Obscene Material to a

) Minor

THE GRAND JURY CHARGES THAT:

CR 123-004

COUNT ONE

Coercion and Enticement of a Minor to Engage in Sexual Activity

18 U.S.C. § 2422(b)

Beginning on or about October 12, 2019, through and until November 17, 2019,
in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did knowingly use a facility of means of interstate commerce, that is, the internet, to
knowingly persuade, induce, entice and coerce Minor Victim #1 (MV1), a minor whose
identity is known to the Grand Jury, who had not attained the age of 18 years, to
engage in sexual activity for which the defendant could be charged with a criminal
offense, that is, production of child pornography pursuant to Title 18 U.S.C. § 2251(a).

All in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO
Production of Child Pornography
18 U.S.C. § 2251(a)

On or about October 14, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did knowingly persuade, induce, entice and coerce Minor Victim #1 (MV1), a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, and such visual depiction had actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; to wit: -1544.jpg, an image depicting MV1 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT THREE
Production of Child Pornography
18 U.S.C. § 2251(a)

On or about October 21, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did knowingly persuade, induce, entice and coerce Minor Victim #1 (MV1), a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, and such visual depiction had actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; to wit: -3345.jpg, an image depicting MV1 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR
Production of Child Pornography
18 U.S.C. § 2251(a)

On or about November 13, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did knowingly persuade, induce, entice and coerce Minor Victim #1 (MV1), a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, and such visual depiction had actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; to wit: -8372.jpg, an image depicting MV1 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE

Transfer of Obscene Material to a Minor
18 U.S.C. § 1470

On or about November 3, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did, by means of interstate commerce, knowingly transfer obscene matter; to wit, - 1529.mp4, to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

All in violation of Title 18, United States Code, Section 1470.

COUNT SIX

Transfer of Obscene Material to a Minor
18 U.S.C. § 1470

On or about November 13, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did, by means of interstate commerce, knowingly transfer obscene matter; to wit, - 2828.jpg to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

All in violation of Title 18, United States Code, Section 1470.

COUNT SEVEN

Transfer of Obscene Material to a Minor
18 U.S.C. § 1470

On or about November 16, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

TIBIUS EDWARDS,

did, by means of interstate commerce, knowingly transfer obscene matter; to wit, - 0210.jpg to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

All in violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATION

The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 1467, 2253, 2254, 2428, and Title 28, United States Code, Section 2461.

Upon conviction of the violation alleged in Count One of this Indictment, the defendant,

TIBIUS EDWARDS,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 2428(a) and (b)(1), and Title 28, United States Code, Section 2461, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation or any property traceable thereto; and any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation or any property traceable thereto.

Upon conviction of one or more of the violations alleged in Counts Two, Three, and Four of this Indictment, the defendant,

TIBIUS EDWARDS,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 2253(a)(1) and (a)(3) and 2254, and Title 28, United States Code, Section 2461, any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United

States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable thereto.

Additionally, upon conviction of the offenses alleged in Counts Five, Six and Seven of this Indictment, the defendant,

TIBIUS EDWARDS,


shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 1467, any obscene material produced, transported, mailed, shipped, or received; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

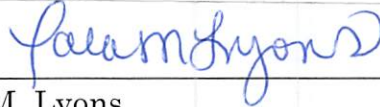
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

{signatures on the following page}

A True Bill. 



David H. Estes
United States Attorney



Tara M. Lyons
Assistant United States Attorney
Deputy Chief, Criminal Division
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